

VIEJAS

TRIBAL GOVERNMENT
GAMING COMMISSION

August 31, 2006

Michael Gross, Sr. Attorney
Comments on Technical Standards
National Indian Gaming Commission
1441 L Street N.W.
Washington, D.C. 20005

Dear Mr. Gross,

Thank you for the opportunity to review and comment on NIGC's proposed Technical Standards for Class II Gaming Technological Aids. Please accept this letter as the submission of written comments on the proposed regulation from the Viejas Band of Kumeyaay Indians.

First please accept our compliments on the significant and successful effort made in extracting the "controls" and "classification" standards which had been co-mingled with the technical standards in previous drafts. We know that this was no small task.

In §547.3 (Definitions), we would like to see the definition of "residual credits" reworded to read "Credits or partial credits remaining which are less than the value of the denomination being played". It may not be "coins or tokens" played, it could be tickets or currency and this suggested change would be more encompassing and accurate.

In §547.6 (d) (5) and (6) we question whether you are asking for the cumulative total of wagers of "all" participants (as worded) or if the game should record the "amount bet by each participant in the game". In reconstructing a game in a dispute investigation, it is necessary to also know what "each" participant wagered. We recommend that both be required to be recorded, total for all, and amount for each participant.

Although much is discussed regarding security of the "bill acceptor" we find little or nothing relative to the security of the currency receptical/storage container commonly referred to as the "stacker can". This can is a separate component from the bill validator or receiver. We suggest that a paragraph be added to §547.7 (l) requiring an independent key for removal of the stacker can and an independent key for access to the contents of the stacker can, and in paragraph (m) of this same section there should be sensor which gives a signal message when the stacker can is removed or not properly seated.

In §547.7 (m) (first sentence) we don't understand why we would want to "exclude" the locked logic areas from having a sensor detecting access. This is a significant security requirement in the Class III arena.

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In §547.7 (q) "Bill validators" we would like to see a paragraph added with language to the effect that "The bill validator shall not allow the player station to add credits to the meter unless and until the currency or ticket is completely seated in the stacker can". We were the victim of thousands of dollars in internal losses because of credits being added before the bills were completely in the can. The bills during bill jams or validator tilts were pocketed by slot techs and the customer still got their credits.

§547.13 generally seems to have a lot of redundancy. We believe that much of the redundancy could be reduced if the "events" listed in paragraphs (b) and (c) were listed as "faults" in paragraph (a). All of the "events" listed in (c) (1) are referred to as "faults" in (c) (2).

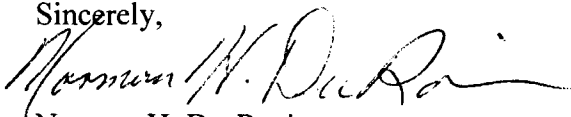
§547.14 (c) (4) refers to "any fault identified in paragraph (a) (1)". We believe this to be an error because faults identified in (a) (1) are already addressed in (a) (3). We think you meant for (c) (4) to read ".....any fault identified in paragraph (c) (1)".

§547.15 (j) (2) states that "The electronic player station may redeem odd cents immediately or after the player finishes playing....". We have experienced significant and expensive problems with this capability. What happens is this scenario. A player has a ticket worth \$65.15 and goes to a machine that plays \$1.00 denominations. The player inserts the ticket and the machine immediately prints out a ticket for the odd 15 cents. The player thinks their ticket was not accepted, they take the ticket worth 15 cents and walk off without looking at it, assuming it is worth \$65.15, when in fact they have left \$65.00 in credit on the machine. By the time they realize that they don't have a ticket worth the full original value, someone else has come along and cashed out the \$65.00 that they left on the machine and made off with it. This happens every day and is a huge headache to investigate repeatedly.

For this reason we strongly recommend that "odd cents" not be allowed to be redeemed "immediately", and only be allowed to be redeemed "after the player finishes playing".

This concludes any substantive written commentary from Viejas on your proposed regulations. Thank you for the opportunity to review and comment. We hope you will find some value in the comments and give them serious consideration.

Sincerely,



Norman H. DesRosiers
Commissioner